

**IRS AND GEORGE WASHINGTON UNIVERSITY TO SPONSOR  
INSTITUTE ON INTERNATIONAL TAX ISSUES**

WASHINGTON — The Internal Revenue Service and George Washington University are jointly sponsoring the Thirteenth Annual Institute on Current Issues in International Taxation, to be held on December 7 and 8, 2000, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for professionals in international tax law.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, as well as leading private sector specialists, to address breaking issues and present key perspectives on new developments. The Institute will open with an address by Jeffrey Owens, Head of Fiscal Affairs Division, Organisation for Economic Co-operation and Development. Topics for other sessions on the first day include corporate tax shelters in an international setting, new ways of handling tax controversies, and updates on inbound and outbound issues. Competent Authority officials from Canada, Japan, the United Kingdom, and the United States will discuss current and emerging issues. Larry Langdon, Commissioner of the IRS Large and Mid-Size Business Division, will provide the luncheon address.

Topics for the second day will focus on international tax issues in the New Economy, including character of income and permanent establishment, e-commerce implications for Subpart F, income sourcing rules and transfer pricing, e-commerce and the EU VAT proposal, and virtual relationships in an e-commerce world. Jonathan Talisman, Acting Assistant Secretary for Tax Policy, Department of the Treasury is scheduled to provide the luncheon address. The second day will also feature the popular "Ask the IRS" panel.

Those interested in attending or obtaining more information should contact The George Washington University, Conference Management Services, by telephone at (202) 973-1110 or by visiting the university's web site at <http://www.gwu.edu/~cms/iti13>.

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